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Corporation

SUPERIOR COURT OF NEW JERSEY
BERGEN COUNTY

NOV 21 2008



IN RE: ALLEGED MAHWAH TOXIC
DUMP SITE LITIGATION

SUPERIOR COURT OF NEW JERSEY
BERGEN COUNTY: LAW DIVISION

CASE NO.: 277 MT

CIVIL ACTION

Master Docket No. L-489-08

**FORD MOTOR COMPANY, FORD
INTERNATIONAL SERVICES, INC.
AND RINGWOOD REALTY'S NOTICE
OF MOTION TO COMPEL PURSUANT
TO R. 4:23-5**

APPLICABLE TO ALL CASES

This matter having come before the Court upon the motion of Defendants Ford Motor Company, Ford International Services, Inc., and Ringwood Realty Corporation, by and through their counsel, Latham & Watkins LLP, to compel discovery pursuant to N.J. Ct. R. 4:23-5; the Court having reviewed all the papers submitted in support of and in opposition to the Motion to Compel, and good cause having been shown:

On this 21 day of NOV, 2008 it is hereby **ORDERED** and **ADJUDGED**
that:

1. The Defendants' Motion to Compel is **GRANTED**;

2. Plaintiffs are hereby compelled to produce to Defendants any and all medical and environmental testing results, and other factual information underlying Plaintiffs' claims of exposure to hazardous substances. Specifically, within two weeks of the issuance of this Order, Plaintiffs shall fully and completely respond to Defendants' Omnibus Set of Interrogatories, Requests for Production of Documents and Things, and Request for Entry Upon Land for Inspection and Other Purposes, Interrog. Nos. 31-32, No. 38, No. 83, No. 90, Nos. 93-95, No. 112, No. 114, No. 119, and No. 122, and Doc. Reqs. No. 13, and Nos. 16-23.


Hon. Jonathan N. Harris

OPPOSED.

THE DISCOVERY MATERIALS
SOUGHT ARE NOT SEEKING
OPINIONS OR EXPERT REPORTS.
RATHER THEY ARE CALCULATED
TO DISCOVER ~~THE~~ FACTS THAT ARE
RELEVANT TO THIS CASE. TO THE
EXTENT THAT SUCH FACTS ARE
WITHIN THE KNOWLEDGE OF EXPERTS
DOES NOT IMMUNIZE THEM FROM
FACT DISCOVERY AT THIS TIME.

